

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

WILLIAM SZYMCAK, STEFAN SCHUELE,  
KIM DREHER, MARIO LOPEZ, MELANIE  
RIVERA, KATRINA BOYD,  
ANGELA GREATHOUSE,  
CORNELIUS JACKSON, DAVID  
SIMONS, LOLITA DILLARD, and  
ANNE STEWART, individually and  
on behalf of others similarly situated,

Plaintiffs,

-against-

NISSAN NORTH AMERICA, INC.,  
and NISSAN MOTOR CO., LTD.,

Defendants.

Civil Action Number:  
10-CV-07493(VB)

**NOTICE OF  
FILING MOTION  
TO TRANSFER  
PURSUANT TO  
28 U.S.C. § 1407**

**Document Filed  
Electronically**

**DEFENDANT NISSAN NORTH AMERICA, INC.'S NOTICE OF FILING OF  
MOTION TO TRANSFER AND CONSOLIDATE PURSUANT TO 28 U.S.C. § 1407**

TO THE CLERK OF THIS COURT AND TO ALL PARTIES AND THEIR  
ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE on February 28, 2012, pursuant to 28 U.S.C. § 1407,  
Defendant Nissan North America, Inc. ("NNA") filed with the Judicial Panel on Multidistrict  
Litigation a Motion for Transfer and Consolidation of this and two similar class actions. Copies  
of the Motion, Brief with Schedule of Actions and other accompanying exhibits, Reasons Why  
Oral Argument Should be Heard, Corporate Disclosure Statement, and Proof of Service are  
attached as **Exhibits 1 – 5**.

NNA files this Notice pursuant to Rule 4.1(b) of the Rules of Procedure of the United  
States Judicial Panel on Multidistrict Litigation (the "Panel") for the purpose of informing the  
Court of the pendency of the proceedings before the Panel and will keep the Court informed of  
further developments.

DATED: February 28, 2012.

Respectfully submitted,

s/ E. Paul Cauley, Jr.

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*Counsel for Defendant Nissan North America, Inc.  
and Nissan Motor Company, Ltd.*

**CERTIFICATE OF SERVICE**

I herby certify that on the 28th day of February 2012, I electronically filed the foregoing **NOTICE OF FILING OF MOTION TO TRANSFER AND CONSOLIDATE PURSUANT TO 28 U.S.C. § 1407** with the U.S. District Court. Notice will automatically be electronically mailed to the following individuals who are registered with the U.S. District Court CM/ECF System:

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s/ E. Paul Cauley, Jr.

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